

**Bratcher, Mike, EMNRD**

---

**From:** Bratcher, Mike, EMNRD  
**Sent:** Friday, November 16, 2012 8:12 AM  
**To:** 'Cliff P. Brunson'  
**Cc:** Josh Russo; Ken Swinney; Kathy Purvis; Jennifer Gilkey  
**Subject:** RE: COG Operating - Choctaw 3" Water Line

Reference: COG Operating \* Choctaw 3" Water Line (aka Willow St. 9 well) \* 30-015-36351 \* O-16-17s-31e \*  
Eddy County, New Mexico  
OCD Tracking Number: 2RP-1220 \* Date of release: 6/29/12

Cliff,

Your proposal for remediation of the above referenced release is approved with the following conditions/stipulations:

- Notify OCD 48 hours prior to commencement of remedial operations.
- Notify OCD 48 hours prior to obtaining samples where the analyses will be submitted to OCD.
- Obtain representative confirmation samples of bottom and sidewalls of excavation.
- Obtain approval prior to backfilling any excavation.
- Submit a closure report and Form C-141 marked Final Report upon satisfactory completion of project.
- Approval by any other regulatory authority as may be applicable.

OCD approval does not relieve the operator of liability should their operations fail to adequately investigate and remediate contamination that may pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the operator of responsibility for compliance with any other federal, state, local laws and/or regulations.

If you have any questions or concerns, and for notifications, please contact me.

Mike Bratcher  
NMOCD District 2  
811 S. First Street  
Artesia, NM 88210  
O: 575-748-1283 X108  
C: 575-626-0857  
F: 575-748-9720

---

**From:** Cliff P. Brunson [<mailto:cbrunson@bbcinternational.com>]  
**Sent:** Tuesday, September 11, 2012 8:32 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Josh Russo; Ken Swinney; Kathy Purvis; Jennifer Gilkey  
**Subject:** COG Operating - Choctaw 3" Water Line

Mike,

This e-mail is to confirm our discussion on September 5, 2012 concerning the remediation plan for the release that occurred at the GOG Operating Choctaw 3' Water Line release site. As agreed, COG will excavate 1 foot across the spill site as depicted on the attached site diagram. The excavation will then be backfilled with clean soil. The depth to groundwater in this area is approximately 300 feet.

I have attached the site drawing and the summary of the laboratory data we reviewed during our discussion for your files. If you would please reply back via e-mail with your concurrence of this remediation plan, it would be greatly appreciated.

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

**Bratcher, Mike, EMNRD**

---

**From:** Microsoft Outlook  
**To:** Cliff P. Brunson; Josh Russo; Ken Swinney; Kathy Purvis; Jennifer Gilkey  
**Sent:** Friday, November 16, 2012 8:12 AM  
**Subject:** Relayed: RE: COG Operating - Choctaw 3" Water Line

**Delivery to these recipients or groups is complete, but no delivery notification was sent by the destination server:**

[Cliff P. Brunson \(cbrunson@bbcinternational.com\)](mailto:cbrunson@bbcinternational.com)

[Josh Russo \(jrusso@concho.com\)](mailto:jrusso@concho.com)

[Ken Swinney \(kswinney@bbcinternational.com\)](mailto:kswinney@bbcinternational.com)

[Kathy Purvis \(kathy@bbcinternational.com\)](mailto:kathy@bbcinternational.com)

[Jennifer Gilkey \(jgilkey@bbcinternational.com\)](mailto:jgilkey@bbcinternational.com)

Subject: RE: COG Operating - Choctaw 3" Water Line

**Bratcher, Mike, EMNRD**

---

**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Tuesday, September 11, 2012 8:32 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Josh Russo; Ken Swinney; Kathy Purvis; Jennifer Gilkey  
**Subject:** COG Operating - Choctaw 3" Water Line  
**Attachments:** Lab Data Summary-Choctaw 3 inch WL.pdf; Site DRWG-Choctaw 3 in WL.pdf

Mike,

This e-mail is to confirm our discussion on September 5, 2012 concerning the remediation plan for the release that occurred at the GOG Operating Choctaw 3' Water Line release site. As agreed, COG will excavate 1 foot across the spill site as depicted on the attached site diagram. The excavation will then be backfilled with clean soil. The depth to groundwater in this area is approximately 300 feet.

I have attached the site drawing and the summary of the laboratory data we reviewed during our discussion for your files. If you would please reply back via e-mail with your concurrence of this remediation plan, it would be greatly appreciated.

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

## Bratcher, Mike, EMNRD

---

**From:** Cliff P. Brunson <cbrunson@bbcinternational.com>  
**Sent:** Tuesday, September 11, 2012 8:37 PM  
**To:** Bratcher, Mike, EMNRD  
**Cc:** Josh Russo; Ken Swinney; Kathy Purvis; Jennifer Gilkey  
**Subject:** FW: COG Operating - Choctaw 3" Water Line  
**Attachments:** Lab Data Summary-Choctaw 3 inch WL.pdf; Site DRWG-Choctaw 3 in WL.pdf

Mike,

My mistake at the end. COG and I thank you for your assistance in handling this matter. I don't think COG needs Oxy to thank you as well. Ha!

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

---

**From:** Cliff Brunson <[cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)>  
**Date:** Tuesday, September 11, 2012 8:31 PM  
**To:** Mike Bratcher <[mike.bratcher@state.nm.us](mailto:mike.bratcher@state.nm.us)>  
**Cc:** Josh Russo <[jrusso@concho.com](mailto:jrusso@concho.com)>, Ken Swinney <[kswinney@bbcinternational.com](mailto:kswinney@bbcinternational.com)>, Kathy Purvis <[kathy@bbcinternational.com](mailto:kathy@bbcinternational.com)>, Jennifer Gilkey <[jgilkey@bbcinternational.com](mailto:jgilkey@bbcinternational.com)>  
**Subject:** COG Operating - Choctaw 3" Water Line

Mike,

This e-mail is to confirm our discussion on September 5, 2012 concerning the remediation plan for the release that occurred at the GOG Operating Choctaw 3' Water Line release site. As agreed, COG will excavate 1 foot across the spill site as depicted on the attached site diagram. The excavation will then be backfilled with clean soil. The depth to groundwater in this area is approximately 300 feet.

I have attached the site drawing and the summary of the laboratory data we reviewed during our discussion for your files. If you would please reply back via e-mail with your concurrence of this remediation plan, it would be greatly appreciated.

Oxy and I thank you for your assistance in handling this matter.

Thanks, Cliff

Cliff P. Brunson, CEI, CRS  
President  
BBC International, Inc.  
World-Wide Environmental Specialists  
Mailing Address:  
P. O. Box 805  
Hobbs, NM 88241-0805 USA  
Shipping Address:  
1324 W. Marland St.  
Hobbs, NM 88240 USA  
Phone: (575) 397-6388  
Fax: (575) 397-0397  
E-Mail: [cbrunson@bbcinternational.com](mailto:cbrunson@bbcinternational.com)

\*\*\*\*\*

Confidentiality Notice: This electronic transmission (and any attached documents) is intended only for the person(s) to whom it is addressed and may contain information that is privileged, confidential, or otherwise protected from disclosure. If you have received this transmission in error, please immediately notify the sender by e-mail or by telephone call to (575) 397-6388 for handling instructions. Any disclosure or distribution of the contents of this transmission by anyone other than the named recipient(s) is strictly prohibited.

\*\*\*\*\*

**Laboratory Analytical Results Summary  
COG, Choctaw 3" Water Line**

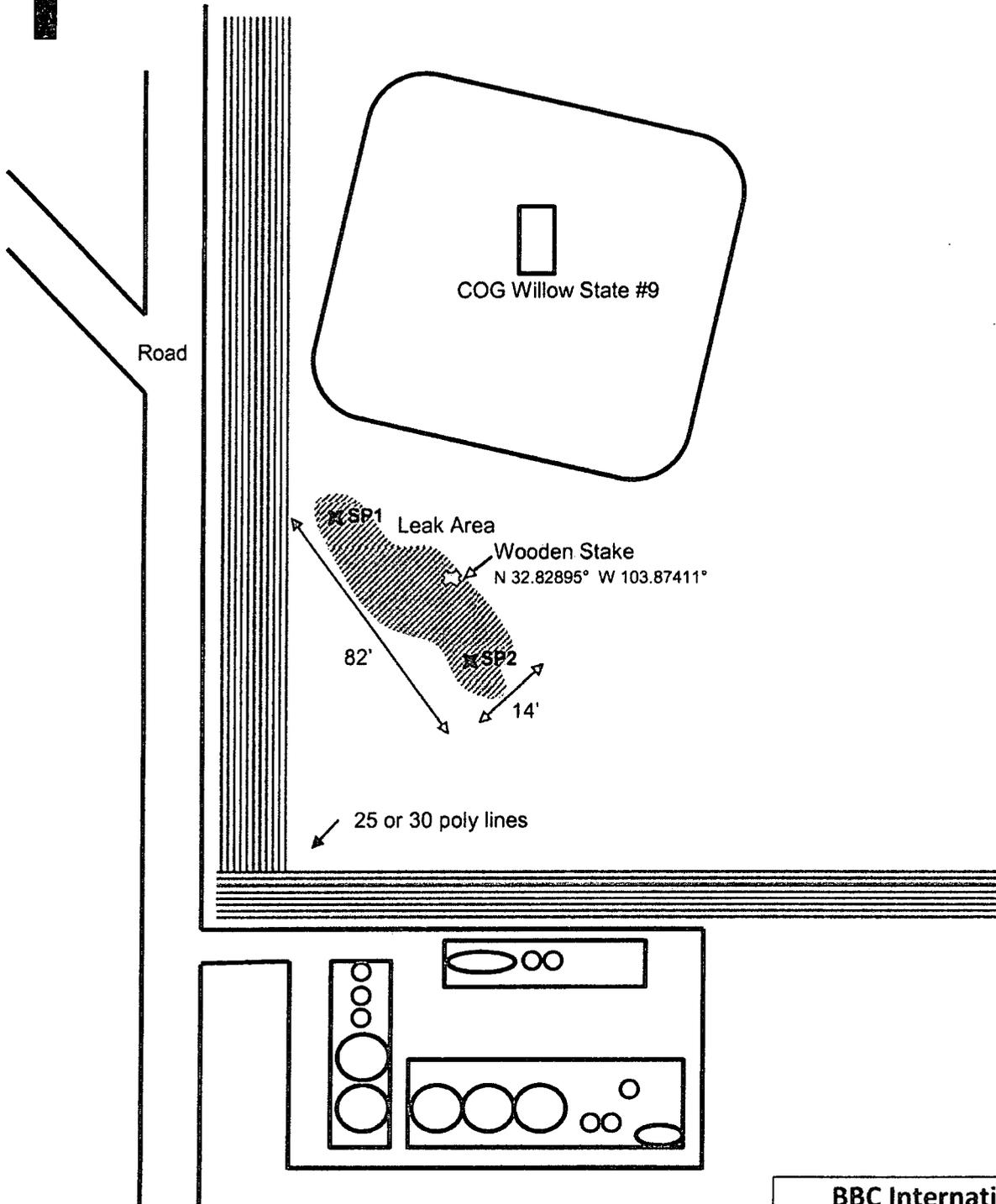
Analyte	Method	Sample Date	SP1 @ SURFACE	SP1 @ 1'	SP1 @ 2'
			7/31/12	7/31/12	7/31/12
			mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	N/A
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	N/A
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	N/A
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	N/A
<b>Chloride</b>	SM4500CI-B		<b>1280</b>	<b>80</b>	<b>16</b>
<b>GRO</b>	TPH 8015M		<10.0	<10.0	N/A
<b>DRO</b>	TPH 8015M		<b>121</b>	<b>13.8</b>	N/A

Analyte	Method	Sample Date	SP2 @ SURFACE	SP2 @ 1'	SP2 @ 2'	SP2 @ 3'	SP2 @ 4'	SP2 @ 5'
			7/31/12	7/31/12	7/31/12	7/31/12	7/31/12	7/31/12
			mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg	mg/Kg
<b>Benzene</b>	BTEX 8021B		<0.050	<0.050	N/A	N/A	N/A	N/A
<b>Toluene</b>	BTEX 8021B		<0.050	<0.050	N/A	N/A	N/A	N/A
<b>Ethylbenzene</b>	BTEX 8021B		<0.050	<0.050	N/A	N/A	N/A	N/A
<b>Total Xylenes</b>	BTEX 8021B		<0.150	<0.150	N/A	N/A	N/A	N/A
<b>Chloride</b>	SM4500CI-B		<b>384</b>	<b>400</b>	<b>160</b>	<b>272</b>	<b>288</b>	<b>80</b>
<b>GRO</b>	TPH 8015M		<10.0	<10.0	N/A	N/A	N/A	N/A
<b>DRO</b>	TPH 8015M		<b>32.8</b>	<10.0	N/A	N/A	N/A	N/A



COG

Choctaw 3' Water Line



Nearest Location:  
COG Willow State #9  
Unit O, Section 16, T17S, R31E  
740'FSL and 2350'FEL  
Eddy County, NM

<b>BBC International, Inc.</b>	
<b>COG</b>	
<b>Choctaw 3" Water Line</b>	
Date: 08/01/2012	DRWG by: K. Purvis
NOT TO SCALE	File: COG 2012